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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. CR 23-CR-264 JSW
)	
Plaintiff,)	STIPULATION REGARDING PROPERTY BOND
)	AND ORDER
v.)	
)	
PATRICK JAMES BERHAN,)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for defendant Patrick James Berhan that the government has reviewed and approved the defendant's bond package and that the time for lodging that package with the Court should be extended to September 1, 2023.

Defendant was charged in an Indictment dated August 16, 2023, with conspiracy to commit wire fraud in violation of 18 U.S.C. § 1349 and wire fraud in violation of 18 U.S.C. § 1343. Defendant appeared before the Court on August 17, 2023, for initial appearance and arraignment. The Court ordered certain conditions of release, including the posting of a secured bond in the amount of \$100,000 by August 24, 2023.

The parties stipulate and agree that, for purposes of that secured bond, the government will accept a valuation based on real estate comparables, including from a real estate aggregator such as the Zillow website or the Redfin website. On August 25, 2023, defense counsel has presented to the government a bond package that includes such a valuation from the website Zillow. The government has approved the bond package for submission to the Court.

The parties further stipulate that the defendant's time to lodge the approved bond package with the Court should be extended from August 24, 2023, to September 1, 2023.

The undersigned Assistant United States Attorneys certify that they have obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: 8/25/23

/s/
Eric Cheng
Ajay Krishnamurthy
Alethea M. Sargent
Assistant United States Attorneys

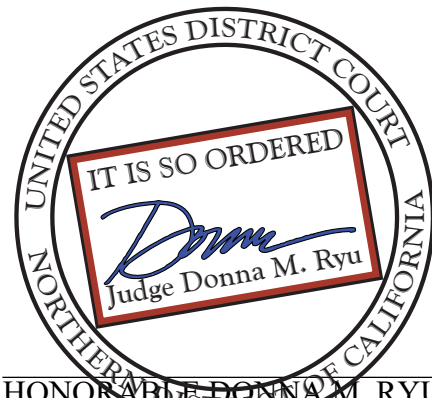
DATED: 8/25/23

/s/
Christopher J. Shea
Counsel for Defendant Patrick Berhan

ORDER

IT IS SO ORDERED.

DATED: August 25, 2023



HONORABLE DONNA M. RYU
Chief Magistrate Judge